

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAYMOND CHARLES ALBERT,

Defendant.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED

INFORMATION

S1 07 Cr. 445 (JSR)

COUNT ONE

The United States Attorney charges:

1. From at least in or about April 2007, up to and including on or about May 19, 2007, in the Southern District of New York and elsewhere, RAYMOND CHARLES ALBERT, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAYMOND CHARLES ALBERT, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C).

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about late April 2007 or early May 2007, a co-conspirator not named as a defendant herein traveled to New York, New York to conduct a narcotics transaction.

b. On or about May 19, 2007, RAYMOND CHARLES ALBERT, the defendant, traveled to Queens, New York to pick up a suitcase containing approximately 4 kilograms of heroin.

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

4. As a result of committing the controlled substance offense alleged in Count One of this Information, RAYMOND CHARLES ALBERT, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting and derived from any proceeds that the said defendant obtained directly and indirectly as a result of the said violation and any and all property used and intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to or deposited with, a third party;


(3) has been placed beyond the jurisdiction of the court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841, 846 and 853.)

  
MICHAEL J. GARCIA  
United States Attorney

August 27, 2007

U.S.A. v. RAYMOND CHARLES ALBERT

S1 07 Cr. 0445(JSR)

**Waiver of Indictment and Information filed.**

Defendant present with atty Edward Sapone, AUSA Avi Weissman, Court reporter Tom Murray.  
The deft entered a plea of guilty. PSI ordered. Sentencing set for December 12<sup>th</sup> at 4:00 p.m.  
The deft continued released on bail.

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**RAKOFF, J.**